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CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY:	DEPUTY

Jobadiah Sinclair Weeks
 CCIS#: 07-577168
 Essex County Correctional Facility
 354 Doremus Avenue
 Newark, New Jersey 07105

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

Mina De Oro, LLC, a Nevada limited
 liability company; The Toy Chest, LLC
 a Nevada limited liability company,

Plaintiffs,
 v. Case No.: 2:20-cv-00994-GMN-VCF

Matthew Brent Goetsche,
 Jobediah Sinclair Weeks,
 Joseph Frank Abel,
 Silviu Catalin Balaci,
 Bitclub, and DOE and ROE Corps.,

Defendants.

**DEFENDANT JOBADIAH SINCLAIR WEEKS' PARTIALLY STIPULATED MOTION
 FOR EXTENSION OF TIME TO RESPOND TO THE COMPLAINT**

(First Request)

Pursuant to LR IA-6-1, I hereby move for a 45-day extension of time in which to respond to the Complaint up to and including October 23, 2020. Plaintiffs' counsel is agreeable to a 14-day extension of time to respond to the Complaint, up to and including September 23, 2020.

MEMORANDUM IN SUPPORT OF THE MOTION

1. The Complaint in the instant action was filed with this Court on June 3, 2020 alleging violations of federal securities laws under 17 C.F.R. § 240.10b-5, Nevada's securities laws (NRS 90.570), common law fraud, and fraudulent inducement.

2. Plaintiffs' counsel contacted one of my criminal defense attorneys, Mr. Adam Schwartz, who is representing me in *United States v. Matthew Brent Goetsche, et al.*, Case No. 1:19-cr-877-CCC (District of New Jersey), regarding a request to accept service of process on my behalf.

3. Mr. Schwartz agreed to accept service of the Complaint, which was subsequently filed on August 4, 2020.

4. Since December 2019, I have been in pretrial detention in Newark on my federal criminal case. Because of COVID-19, the jail has been keeping federal detainees locked in their cells for 18 hours a day. This is for social distancing purposes and to keep the detainees healthy. As a consequence, we have limited access to phones and computers. This has been my situation since the middle of March.

5. I am not familiar with the federal civil rules of procedure or the law regarding the causes of action in the Complaint. I need time to learn these rules and study the law, or get an attorney to represent me.

6. I am in the process of trying to retain an attorney to represent me in this case or prepare a response on my own to the allegations in the Complaint. Because of my current circumstances, I need more time to find an attorney or prepare my response.

7. My criminal defense attorneys have reached out to plaintiffs' counsel several times. It's my understanding that plaintiffs' counsel is agreeable to a 14-day extension of time, up to and including September 23, 2020, for me to respond to the Complaint. I need more time. I am requesting a 45-day extension of time to respond to the Complaint, up to and including October 23, 2020.

8. It's my understanding that no other defendant has been served in this case or filed a response to the Complaint. So, no prejudice should come to the plaintiffs for granting my request for an extension of time.

9. I would ask that all correspondence and pleadings be mailed to me at the address below with my detainee number listed by my name to ensure I receive it.

WHEREFORE, I request that an order granting this Partially Stipulated Motion for Extension of Time be granted, extending the time for me to respond to the Complaint up to and including October 23, 2020.

Date: September 9, 2020

Respectfully submitted,

Jobadiah Weeks /ss
Jobadiah Sinclair Weeks
CCIS#: 07-577168
Essex County Correctional Facility
354 Doremus Avenue
Newark, NJ 07105

CERTIFICATE OF SERVICE

I hereby certify that on September 9, 2020, I mailed the foregoing motion to the Clerk of Court and to Plaintiffs' counsel.

Jobadiah Weeks /ss
Jobadiah Sinclair Weeks